

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	
)	Chapter 11
CII PARENT, INC., ¹)	
)	Case No. 22-11345-LSS
Debtor.)	
)	Re: Dkt. Nos. 12 & 45

**MOTION FOR ENTRY OF AN ORDER GRANTING LEAVE TO EXCEED THE PAGE
LIMITATION WITH RESPECT TO THE OBJECTION OF TWIN BROOK CAPITAL
PARTNERS, LLC, AS AGENT, TO DEBTOR’S MOTION FOR ENTRY OF AN ORDER
ENFORCING THE AUTOMATIC STAY AND GRANTING RELATED RELIEF**

Twin Brook Capital Partners, LLC, in its capacity as agent (“Agent”) for the lenders under a prepetition secured credit facility provided to the Debtor’s direct and indirect subsidiaries, hereby submits this motion (this “Motion to Exceed”) for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), pursuant to Rule 7007-2(a)(iv) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), granting the Agent leave and permission to file the *Objection of Twin Brook Capital Partners, LLC, as Agent, to Debtor’s Motion for Entry of an Order Enforcing the Automatic Stay and Granting Related Relief* [Docket No. 45] (the “Objection”),² in excess of the page limitation established by the Local Rules. In support of this Motion to Exceed, the Agent respectfully states as follows:

1. Pursuant to Local Rule 7007-2(a)(iv), absent leave of the Court, “no opening or answering brief shall exceed thirty (30) pages and no reply shall exceed fifteen (15) pages . . . exclusive of any table of contents or table of citations.” Although Local Rule 7007-2

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor’s federal tax identification number, is: CII Parent, Inc. (4706). The location of the Debtor’s address is 21 Custom House Street, Boston, MA 02110.

² Capitalized terms used but not defined herein shall have the meanings given in the Objection.

applies only to opening and responsive briefs and replies in adversary proceedings, the Court's General Chambers Procedures also makes the Rule applicable to briefs and memoranda in main bankruptcy cases. General Chambers P. § 2(a)(vi). Thus, absent leave of the Court, the Agent may be limited to thirty (30) pages for the Objection, and therefore, out of an abundance of caution, the Agent seeks leave from Local Rule 7007-2(a)(iv) to allow the Agent to fully address the arguments made in the Motion.

2. The Agent respectfully submits that permitting the Objection to exceed the thirty (30) pages allotted by Local Rule 7007-2(a)(iv) is appropriate. The Motion raises a number of significant issues that must be thoroughly addressed. Although the Agent made the Objection as succinct as possible under the circumstances, considering the scope of the issues raised in the Motion, it simply could not provide the Court with the information and analyses necessary for the full and fair adjudication of the matters presented within the applicable page limitations. Accordingly, the Agent submits that sufficient cause exists to grant the relief requested herein.

CONCLUSION

WHEREFORE, the Agent respectfully requests that the Court enter the Proposed Order, granting leave to exceed the page limitation for the Objection and such other and further relief as may be just and proper.

Dated: January 27, 2023
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Kara Hammond Coyle
James P. Hughes, Jr., Esq. (No. 3102)
Michael R. Nestor, Esq. (No. 3526)
Kara Hammond Coyle, Esq. (No. 4410)
James M. Yoch, Jr., Esq. (No. 5251)
Rodney Square
1000 North King Street
Wilmington, DE 19801
Telephone: (302) 571-6600
Email: jhughes@ycst.com
mnestor@ycst.com
kcoyle@ycst.com
jyoch@ycst.com

-and-

KATTEN MUCHIN ROSENMAN LLP
Peter K. Knight, Esq. (admitted *pro hac vice*)
Terence G. Banich, Esq. (admitted *pro hac vice*)
Allison E. Yager, Esq. (admitted *pro hac vice*)
525 West Monroe Street
Chicago, IL 60661
Telephone: (312) 902-5200
Email: peter.knight@katten.com
terence.banich@katten.com
allison.yager@katten.com

Counsel for Twin Brook Capital Partners, LLP, as Agent